

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

LISA GALLAGHER,	)	
Plaintiff,	)	
	)	
v.	)	C.A. NO. 1:13-cv-00038-M-LDA
	)	
ASSET MANAGEMENT WEST	)	
10, LLC, ALIAS, MORTGAGE	)	
ELECTRONIC REGISTRATION	)	
SYSTEMS, INC., ALIAS, WEST	)	
COAST SERVICING, INC., ALIAS	)	
KENAN THAYER, ALIAS, AND	)	
JOHN DOE, ALIAS,	)	
Defendants.	)	

**MOTION TO EXTEND DEADLINE TO RESPOND TO DISCOVERY**

Defendants Asset Management West 10, LLC, West Coast Servicing, Inc., and Mortgage Electronic Registration Systems, Inc. (collectively “Defendants”) hereby move the Court for an Order extending the deadline to respond to plaintiff’s discovery requests until April 8, 2014. In support of this Motion, Defendants state the following:

- 1) On February 23, 2014, plaintiff Lisa Gallagher (“Plaintiff”) served interrogatories directed to defendant Asset Management West 10, LLC (“Asset Management”). Pursuant to Fed. R. Civ. P. 33, Asset Management’s deadline to respond to the requests is March 25, 2014.
- 2) On February 25, 2014, Plaintiff served requests for admission directed to each of the Defendants. Each request contains 157 separate requests for admission. Pursuant to Fed. R. Civ. P. 36, Defendants’ deadline to respond to the requests is March 27, 2014.

3) On March 13, 2014, the parties participated in mediation before ADR Administrator Berry Mitchell. The mediation was suspended at the end of the day, and is scheduled to continue on Monday, March 24, 2014.

4) Defendants respectfully submit that a limited extension of time to allow the parties to attempt to resolve the matter through mediation will not unduly delay or prejudice any of the parties. Defendants further submit that a limited extension of time is reasonable in any event due to the large number of requests for admissions Defendants are responding to.

5) Plaintiff does not assent to this motion.

WHEREFORE, Defendants respectfully move the Court for an order extending the deadline to respond to Plaintiff's discovery requests until April 8, 2014.

Respectfully submitted,

Defendants,  
Asset Management West 10, LLC, West Coast  
Servicing, Inc., and Mortgage Electronic  
Registration Systems, Inc.,  
By their Attorneys,

/s/ Shanna M. Boughton  
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Date: March 20, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that on March 20, 2014 the foregoing document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electric Filing and paper copies will be sent to those indicated as non-registered participants.

/s/ Shanna M. Boughton  
Shanna M. Boughton